



EXHIBIT A

**TO AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION
OF DEPARTMENT OF PUBLIC SAFETY
Topics for Examination**

1. Guidelines, regulations, policies and procedures related to implementation of the election identification certificate (EIC) provisions of Senate Bill 14 (2011) ("SB 14"), as established under Section 521A.001 of the Texas Transportation Code, including:
 - (a) the form and appearance of EICs;
 - (b) the standards and process for the issuance and renewal of EICs;
 - (c) the application to obtain an EIC;
 - (d) the information required from persons who apply for an EIC;
 - (e) the processing of EIC applications;
 - (f) the tracking and recording of applications and EIC issuance, including the demographics of applicants and volume and locations of applications;
 - (g) the tracking and recording of how many applicants have been given an EIC and how many applications were deficient;
 - (h) the standards and procedures under which an EIC may be canceled; and
 - (i) the expiration dates of EICs.
2. All rules, regulations, and notices related to EICs, including Section 15.181-15.185 of the Texas Administrative Code.
3. All offices, including EIC mobile stations in Texas at which EICs are or may be made available, their respective hours of operation, wait times required to receive in-person customer service at each such location (including any preferential treatment provided to EIC applicants), the resources available for customers with limited English proficiency, and any future plans on each of these issues.
4. All offices in Texas at which driver's licenses, personal identification cards, and licenses to carry concealed handguns are or may be made available, their respective hours of operation, wait times required to receive in-person customer service at each such location, the resources available for customers with limited English proficiency, and any future plans on each of these issues.
5. Accessibility by means of public transportation of each office or EIC mobile station in Texas at which EICs are or may be made available.
6. Budget and staffing of offices, including EIC mobile stations in Texas at which EICs are or may be made available.
7. Any review or analysis conducted or received by DPS relating to DPS's decisions regarding whether, where, and when to place EIC mobile stations, including on high school, college and university campuses, and whether, where, and when to provide for extended DPS hours

to accommodate individuals seeking EICs, and how public notice was provided regarding these decisions.

8. All evaluations and analyses regarding the impact of the EIC program on DPS's overall delivery of services.
9. All coordination and correspondence with the Secretary of State's office, the Governor's office, the Lieutenant Governor's office, or other state or county election officials about the administration of the EIC program, including coordination and correspondence with county assessor-collectors, elections administrators, Voter Registrars, district clerks, county judges, county sheriffs regarding the issuance of EICs from non-DPS locations.
10. The training of DPS employees and all related training materials regarding the administration of the EIC program, including the relevant dates, locations, and budget.
11. All efforts and materials designed to educate the public concerning EICs, including notification of EIC costs and requirements, availability of discounted birth certificates, assistance to individual voters, expanded DPS hours, waiting line priority for EIC applicants, dates and locations of EIC mobile units, including any public notice provided concerning the same, and EIC availability at county offices or other non-DPS locations.
12. All efforts to provide outreach and assistance to voters wishing to obtain EICs—including any telephone help lines, internet chat lines, social media communications, webinars, and direct contact (telephonic or in-person) with specific voters, such as those identified in the media as having problems obtaining EICs—including the budgets, times, locations, staffing, wait times, and content of such efforts, as well as the estimated and actual number of persons assisted by such efforts and the number of persons who successfully obtained EICs as a result of such efforts.
13. Any correspondence, concerns, or complaints from the public received by DPS regarding the distribution of EICs, and any responses concerning the same.
14. The processes and costs for a voter to obtain secondary identification necessary to obtain an EIC pursuant to S.B. 14 and Section 15.182 of the Texas Administrative Code.
15. Guidelines, regulations, policies, and procedures related to the issuance or renewal of Texas driver licenses.
16. Guidelines, regulations, policies, and procedures related to the issuance or renewal of state personal identification cards.
17. Guidelines, regulations, policies, and procedures related to the issuance of state licenses to carry a concealed handgun.
18. All rules, regulations, and notices related to the revocation, suspension, or cancellation of Texas driver licenses.

19. All information and data provided to or requested by the Texas legislature, directly or through another Texas agency or official, related to SB 14 (2011), SB 362 (2009), HB 218 (2007), or HB 1706 (2005) during the consideration, preparation for implementation, or implementation of those bills, including but not limited to the possession of forms of identification issued by the Department of Public Safety by individual voters and the availability of such identification.
20. All analyses of registered voters, including racial demographics, who possess or do not possess a Texas driver license, personal identification card, or license to carry a concealed handgun conducted between January 1, 2005 and May 27, 2011, including but not limited to analyses conducted in February or March 2011 by the Department of Public Safety and the Elections Division of the Secretary of State.
21. All analyses of registered voters, including racial demographics, who possess or do not possess a Texas driver license, personal identification card, or license to carry a concealed handgun conducted between August 31, 2012 and the present.
22. The process, manner, and method of identifying and producing documents responsive to the United States' First Set of Requests for Production of Documents in this litigation.
23. Guidelines, regulations, policies, and procedures related to the ability of non-citizens to obtain a Texas driver license, a Texas personal identification card, or a license to carry a concealed handgun.